



"Gateway to a Good Life"
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City of Gooding

Incorporated November 21, 1910

Mayor: Jeff Brekke
Clerk: Hollye Lierman

City Council
Michael 'Mitch' Arkoosh
Vern France
Chuck Cram
Colin Smith

FEB 12 2018

February 8, 2018

EPA - REGION 10
Office of Compliance and Enforcement

Dear Mr. Andrews,

In response to a "Notice of Violation" report received by our office on January 25, 2018 indicating 262 Violations of our NPDES Permit # ID-002002-8. Below are the reported Violations followed by the documented cause of the violation and steps taken to prevent further occurrences in the future. Please note that the city of Gooding has been working with our city engineer Keller Associates to evaluate the ability of the Wastewater Treatment Plant to achieve the limits of both our current and future NPDES permit levels and have determined that either a new plant or substantial process upgrades will be necessary. We are scheduled for a Judicial Confirmation hearing on February 13th at 1:30 PM here in Gooding Idaho to present our justifications so that we may bond for the needed upgrades which are tentatively scheduled to be completed by 2019.

Effluent Exceedance Violations:

June 2013, Fecal coliform Daily Max-

Explanation in DMR; Sample error, Operator Luis Running Bear noted the following in the DMR; Coliform sample of 6/13 was 1733/100ml due to a contaminated sample dipper. Follow up sample of 6/17 was <1 or non detect. 6/6 <1 or non detect. 6/20 <1 or non detect. 6/27 <1 or non detect. Staff reviewed sampling procedures to deter repeat occurrences.

August 2014, Ammonia Monthly Average-

Explanation in DMR: *Nitrogen Ammonia Violation: The treatment plant had a major equipment failure with one aerator on our oxidation ditch. The aerator had major parts rebuilt, this took about two weeks to complete. During this time period we were not able to keep the dissolved oxygen levels high enough and ammonia removal dipped below our permit requirements. As soon as repairs were completed the ammonia removal quickly came back up and is now meeting our permit requirements. Coliform Violation: During the month of August the City of Gooding experienced two severe storm events, both occurred in consecutive days. Both storms came with unprecedented amounts of hail and heavy rains. The treatment plant received very high flows from these events. During these high flows the plant exceeded the daily max for coliforms. Within a few days the coliforms started to lower and soon was back in compliance.*

August 2014, Ammonia Daily Max-

Explanation in DMR; *The treatment plant had a major equipment failure with one aerator on our oxidation ditch. The aerator had major parts rebuilt, this took about two weeks to complete. During this time period we were not able to keep the dissolved oxygen levels high enough and ammonia removal dipped below our permit requirements. As soon as repairs were completed the ammonia removal quickly came back up and is now meeting our permit requirements. Maintenance records show that the Drive box, input shaft and bearing assembly on the Aerator was replaced on August 7, 2014.*

August 2014, Fecal coliform-

Coliform Violation: During the month of August the City of Gooding experienced two severe storm events, both occurred in consecutive days. Both storms came with unprecedented amounts of hail and heavy rains. The treatment plant received very high flows from these events. During these high flows the plant exceeded the daily max for coliforms. Within a few days the coliforms started to lower and soon was back in compliance.

Maintenance records show that the Drive box, input shaft and bearing assembly on the Aerator was replaced on August 7, 2014.

December 2014, Fecal coliform Weekly Geo-

Explanation DMR; Coliform violation- *We experienced a major break in our chlorination equipment, we have repaired the break. We are in the process of installing new CL2 equipment to prevent further problems.*

December 2014, Fecal coliform Daily Max-

Explanation in DMR; Coliform violation- *We experienced a major break in our chlorination equipment, we have repaired the break. We are in the process of installing new CL2 equipment to prevent further problems.*

June 2016, Ammonia Monthly Average-

Explanation in DMR; *The aireator in oxidation ditch went down, was repaired asap, numbers are back where they should be. Thanks Paul Childs*

June 2016, Ammonia Daily Max-

Explanation in DMR; *The aireator in oxidation ditch went down, was repaired asap, numbers are back where they should be. Thanks Paul Childs*

August 2016, Fecal coliform Daily Max-

Explanation on DMR; *Fecal Coliform Daily Max Violation- Unknown cause for (1) Fecal Test; all Test prior and after were all within parameters. Per Operator Paul Childs 9/13/2016*

March 2017, Ammonia Monthly Average-

The operator Paul Childs has indicated that one of the two the Aerators was down for repairs for two (2) days causing the violation, the city has purchased spare parts to shorten down times and is currently evaluating new treatment technology with plans to install by 2019.

June 2017, Ammonia Monthly Average-

Explanation in DMR; *Storm knocked out power for several hours, had no oxygen to ditch which caused ammonia to rise power was restored numbers are back in line. New plant scheduled to build in 2018 has backup generator.*

June 2017, Ammonia Daily Max-

Explanation in DMR; *Storm knocked out power for several hours, had no oxygen to ditch which caused ammonia to rise power was restored numbers are back in line. New plant scheduled to build in 2018 has backup generator.*

July 2017, Ammonia Monthly Average-

Operator Paul Childs explanation on DMR form; *Extremely hot weather, low flows going into plant, broken weir on oxidation ditch not allowing enough oxygen into ditch weir has since been repaired along with aerator flows are back up numbers are going back down.*

July 2017, Ammonia Daily Max-

Operator Paul Childs explanation on DMR form; *Extremely hot weather, low flows going into plant, broken weir on oxidation ditch not allowing enough oxygen into ditch weir has since been repaired along with aerator flows are back up numbers are going back down.*

August 2017, Ammonia Monthly Average-

August 8th through the 11th, Variable frequency drive motor burned up and had to be replaced and August 16th a belt broke and had to be replaced, please note that alternative treatment methods being studied which are discussed in our recently completed Wastewater Facility Planning Study. The new treatment process will ensure our ability to meet the standards of not only our current limits but those of the pending NPDES permit.

August 2017, Ammonia Daily Max-

August 8th through the 11th, Variable frequency drive motor burned up and had to be replaced and August 16th a belt broke and had to be replaced, please note that alternative treatment methods being studied which are discussed in our recently completed Wastewater Facility Planning Study. The new treatment process will ensure our ability to meet the standards of not only our current limits but those of the pending NPDES permit.

September 2017, Ammonia Monthly Average-

The violation was not noticed while inputting the values and the Operator stated that he received no onscreen prompt to indicate an error, review of plant records did not reveal an obvious cause, while we know it was related to the aeration process no mechanical failures occurred that would explain it. Staff will be more diligent in review of data being entered.

DMR Late and non-receipt Violations:

March 2014-

No explanation, no staff responsible for reporting at that time are currently employed by the city of Gooding, hard copy on file indicates that it was completed on 4/9/2014.

August 2015-

No explanation, no staff responsible for reporting at that time are currently employed by the city of Gooding, hard copy on file indicates it was completed on 9/11/2015.

October 2015-

No explanation, no staff responsible for reporting at that time are currently employed by the city of Gooding, hard copy on file indicates it was completed on 11/10/2015.

February 2016-

No explanation, no staff responsible for reporting at that time are currently employed by the city of Gooding, hard copy on file indicates it was completed on 3/10/2016.

All hard copy reports of the late or missing DMR's are on file at the City of Gooding City Hall, if duplicate reports are needed we can provide them to your office.

Larry Bybee



Public Works Director
City of Gooding



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

OFFICE OF
COMPLIANCE AND ENFORCEMENT

JAN 25 2018

Reply to: OCE-101

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

The Honorable Jeff Brekke
Mayor
City of Gooding
308 5th Avenue West
Gooding, Idaho 83330

Re: City of Gooding WWTP NPDES Compliance Inspection
NPDES Permit Number ID-002002-8

Dear Mayor Brekke:

On March 27, 2000, the U.S. Environmental Protection Agency (EPA) issued a National Pollutant Discharge Elimination System (NPDES) permit to the City of Gooding, Idaho ("City") wastewater treatment facility ("Facility"), NPDES Permit Number ID-002002-8 ("Permit"). The Permit became effective on May 1, 2000, and expired on May 1, 2005. Subsequently, the Permit was administratively continued. The purpose of this letter is to notify you of violations EPA discovered after reviewing administrative files, including Discharge Monitoring Reports (DMRs) submitted by the City, and in response to the September 28, 2017, inspection of the Facility conducted by the Idaho Department of Environmental Quality (IDEQ) on behalf of EPA. The purpose of this inspection was to determine the Facility's compliance with the requirements of the Clean Water Act (CWA) and its NPDES permit. I would like to express my appreciation for your staff's time and cooperation during the inspection.

REVIEW OF ADMINISTRATIVE FILES

1. EPA reviewed the DMRs from January 2013 through December 2017 and identified effluent limitation exceedances that constitute 262 violations of the CWA, 33 U.S.C. § 1251 *et seq.* A list of these violations is enclosed (Enclosure 1).
2. Part II.C of the Permit states that monitoring results shall be summarized each month on the DMR form (EPA No. 3320-1), shall be submitted monthly and are to be postmarked by the 10th day of the following month.

During the EPA review of DMR data from January 2013 through December 2017, EPA found that the Facility submitted three DMRs late and a fourth DMR was not submitted at all. Failure to submit DMRs, or to submit them on time, is a violation of Part II.C of the Permit. A list of these violations is enclosed (Enclosure 2).

cc: Mr. Tyler Fortunati
Idaho Department of Environmental Quality

Mr. David Anderson
Idaho Department of Environmental Quality

Ms. Maria Lopez
Environmental Protection Agency

Mr. Larry Bybee
City of Gooding, Idaho

Effluent Exceedance Violations

Month	Parameter	DMR Value	Permit Limit	Unit	Limit Type	# Violations
June 2013	Fecal coliform	1733	500	#/100mL	Daily Mx	1
August 2014	Ammonia	.89	.5	mg/L	Mo Avg	31
August 2014	Ammonia	3	1.3	mg/L	Daily Mx	1
August 2014	Fecal coliform	1730	500	#/100mL	Daily Mx	1
December 2014	Fecal coliform	85	50	#/100mL	Wkly Geo	7
December 2014	Fecal coliform	1990	500	#/100mL	Daily Mx	1
June 2016	Ammonia	1.07	.5	mg/L	Mo Avg	30
June 2016	Ammonia	2.13	1.3	mg/L	Daily Mx	1
August 2016	Fecal coliform	2420	500	#/100mL	Daily Mx	1
March 2017	Ammonia	.62	.5	mg/L	Mo Avg	31
June 2017	Ammonia	1.61	.5	mg/L	Mo Avg	30
June 2017	Ammonia	5.86	1.3	mg/L	Daily Mx	1
July 2017	Ammonia	5.49	.5	mg/L	Mo Avg	31
July 2017	Ammonia	6.25	1.3	mg/L	Daily Mx	1
July 2017	Ammonia	11.7	4.2	lb/d	Mo Avg	31
July 2017	Ammonia	14.6	10.8	lb/d	Daily Mx	1
August 2017	Ammonia	1.56	.5	mg/L	Mo Avg	31
August 2017	Ammonia	3.73	1.3	mg/L	Daily Mx	1
September 2017	Ammonia	.76	.5	mg/L	Mo Avg	30

DMR Late and Non-Receipt Violations

Monitoring Period	Date Due	Date Received
March 2014	April 10, 2014	May 12, 2014
August 2015	September 10, 2015	October 12, 2015
October 2015	November 10, 2015	January 6, 2016
February 2016	March 10, 2016	--